

# EXHIBIT A

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SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - MIDDLESEX COUNTY  
DOCKET NO. MID-L-003809-18AS

KAYME A. CLARK and )  
DUSTIN W. CLARK, ) 104 HEARING  
)  
Plaintiffs, ) TRANSCRIPT OF  
) PROCEEDINGS  
v. )  
) (VOLUME I)  
)  
JOHNSON & JOHNSON, et al., )  
et al., )  
)  
Defendants. )  
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Place: Middlesex County Courthouse  
56 Paterson Street  
New Brunswick, New Jersey 08903

Date: May 29, 2024  
9:02 a.m.

B E F O R E:

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WITNESS

DIRECT

CROSS

WILLIAM EDWARD LONGO

EXAMINATION BY:

MR. DUBIN

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MR. BRALY

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1 A. That's correct.

2 Q. And, in fact, you said that as of  
3 2019 you had never analyzed a sample of talc for the  
4 presence of asbestos from start to finish using PLM,  
5 correct?

6 A. Correct.

7 Q. And at least as of 2023, when we last  
8 asked you, you said you had never taken any classes  
9 in the type of PLM analysis we're going to be  
10 talking about which is referred to as PLM dispersion  
11 staining, not a single class, right?

12 A. No, sir.

13 Q. So, it's correct you didn't take a  
14 class, right?

15 A. Never taken a class in PLM analysis  
16 to understand how to identify asbestos in  
17 asbestos-added products.

18 Q. You are a self-taught PLM  
19 analysis -- analyst, right?

20 A. Yes, sir. I don't want to sound, you  
21 know, braggadocios, but I have a Ph.D. in material  
22 science and engineering where you know everything  
23 about every type of microscope, et cetera, and  
24 typically Ph.D. levels don't take basic PLM classes.  
25 I know the science really well on PLM. I could

1 analyze those samples but it would take me all day  
2 so I don't do it.

3 Q. Okay. We'll talk more about that a  
4 little bit later but...

5 And if we look at the reports in  
6 which MAS has claimed to find chrysotile in  
7 Johnson & Johnson, you can see the names of the  
8 people who actually did the analysis, right?

9 A. Correct.

10 Q. And you are never listed as the  
11 analyst?

12 A. Well, the only people that is listed  
13 as the analyst is the person that goes from start to  
14 finish. When I sit down or there's a structure that  
15 there's some debate on it and I sit down and look at  
16 it and go through it, I don't put my name down for  
17 one structure. That's not fair.

18 Q. Okay. But, again, the analyst would  
19 typically be somebody like a Paul Hess, right?

20 A. Correct.

21 Q. Okay. But you, I think you just said  
22 you feel comfortable answering questions today about  
23 PLM dispersion analysis and how it's done at MAS,  
24 right?

25 A. Yes, sir.

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